

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA)	
)	
<i>Plaintiff</i>)	
)	
v.)	Case No. 4:21-cr-005-O-1
)	
THE BOEING COMPANY,)	
)	
<i>Defendant</i>)	
_____)	

**AMENDED UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO LETTER OF MS. ERIN COX**

Undersigned counsel for Movants Naoise Connolly Ryan, Emily Chelangat Babu and Joshua Mwazo Babu, Catherine Berthet, Huguette Debets, Luca Dieci, Bayihe Demissie, Sri Hartati, Zipporah Kuria, Javier de Luis, Nadia Milleron and Michael Stumo, Chris Moore, Paul Njoroge, Yuke Meiske Pelealu, John Karanja Quindos, and Guy Daud Iskandar Zen S. (“victims’ families”) move for an extension of time to file a response to Ms. Erin Neely Cox’s declaration.

As this Court is aware, the victims’ families have filed a Motion for Findings that the Proposed Boeing Deferred Prosecution Agreement was Negotiated in Violation of Crime Victims’ Rights Act (“Victims’ Rights Motion”) (DE 15).

On January 11, 2022, the Court directed the Government, Boeing, and the victims’ families to all respond a declaration from Ms. Cox’s declaration by Tuesday, January 18, 2022. Thereafter, the Government and Boeing received an extension of time to file their response until Thursday, January 20, 2022.

The victims' families move for an extension of time to respond to Ms. Cox's declaration and request that they be permitted to respond no later than January 20, 2022.

Counsel for Ms. Cox has agreed to the requested extension, as have counsel for the Government and Boeing.

Dated: January 18, 2022

Respectfully submitted,

/s/ Warren T. Burns

Paul G. Cassell (Utah Bar No. 06078)

Admitted *pro hac vice*

(Counsel of Record)

Utah Appellate Project

S.J. QUINNEY COLLEGE OF LAW

University of Utah

383 S. University St.

Salt Lake City, UT 84112

801-585-5202

cassellp@law.utah.edu

(no institutional endorsement implied)

Warren T. Burns (Texas Bar No. 24053119)

Burns Charest, LLP

900 Jackson Street

Suite 500

Dallas, TX 75202

469-904-4550

wburns@burnscharest.com

ATTORNEYS FOR VICTIMS' FAMILIES

CERTIFICATE OF CONFERENCE

Pursuant to Local Criminal Rule 47.1(b), on January 14, 2022, counsel for the Movants conferred with counsel for the United States of America, counsel for The Boeing Company, and counsel for the third-party declarant, Marianne M. Auld, Esq., via email. Counsel for the United States of America, The Boeing Company and the third-party declarant have stated they are unopposed to the extension to January 20, 2022.

/s/ Warren T. Burns

Warren T. Burns

CERTIFICATE OF SERVICE

I certify that on January 18, 2022, the foregoing document was served on the parties to the proceedings via the Court CM/ECF filing system.

/s/ Warren T. Burns

Warren T. Burns